

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

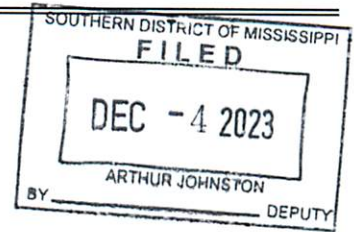
for the

Southern District of Mississippi

United States of America
v.
WILLIE SPENCE MANNING, Jr.

Case No. 1:23-mj-

151-BWR



Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 7, 2023 in the county of Hancock in the
Southern District of MS, Southern Division, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 841(a)(1) and (b)(1)(C) Possession with Intent to Distribute a Controlled Substance, Fentanyl

This criminal complaint is based on these facts:

See affidavit attached hereto and incorporated herein

☒ Continued on the attached sheet.

Complainant's signature

William Cotter, Task Force Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

12/4/2023

Judge's signature

City and state:

Gulfport, Mississippi

Bradley W. Rath, United State Magistrate Judge

Printed name and title

AFFIDAVIT

I, William Cotter, being first duly sworn, hereby depose and say that:

1. I, William Cotter, am a Narcotics Investigator with the Hancock County Sheriff's Office assigned as a Task Force Officer to the Homeland Security Investigations Border Enforcement Security Task Force. Prior to working for the Sheriff's Office, I served as a TFO with the Drug Enforcement Administration for three years. During my assignment at the DEA, my primary duties included the investigation of organized narcotics traffickers and illegal pharmaceutical narcotics distribution. Throughout my narcotics career, I have participated in numerous investigations, during the course of which I have conducted or participated in physical and electronic surveillance, undercover drug transactions, the introduction of undercover agents, the execution of search warrants, debriefing of informants, and reviews of taped conversations and drug records. I have also been the Affiant for search warrants and arrest warrants. Following being assigned to DEA, I was assigned as the Commander of Field Operations for the City of Waveland Police Department. At Waveland Police Department I supervised in the upwards of 30 sworn law enforcement officers. Through my training, education, and experience, I have become familiar with the manner in which illegal drugs are transported, stored, distributed and the methods of payments for such drugs.

Statement of Probable Cause

2. On August 7, 2023, in the Southern District of Mississippi, agents followed up on a lead that led to the recovery of 177.68 grams of fentanyl from Willie Spence Manning, Jr.
3. The Hancock County Sheriff's Office had information related to Willie Spence MANNING, Jr. selling counterfeit Oxycodone pills in the area of Bay St. Louis, Mississippi. On August 7, 2023, HCSO Narcotics Division received an anonymous tip

pertaining to MANNING distributing narcotics from his residence located at 702 Spanish Acres Drive, Bay St. Louis, Mississippi.

4. On the same date at approximately 1300 hours, agents began conducting surveillance on MANNING's address. At 1335 hours, Agents Patrick Crowe and Ryan Fife observed a Ford Focus arrive at the Corner Market, 1139 Old Spanish Trail, being occupied by a white female driver and black male passenger. Neither occupant exited the vehicle to enter the store. Agents observed the male holding money in his hand, being on the phone and looking around, consistent with preparing for a narcotic transaction.
5. Shortly after, Agent Natalia Exposito witnessed MANNING exit his residence and get into a Toyota Prius, blue in color, displaying a Mississippi license plate. The vehicle departed traveling towards Old Spanish Trail. Agent Cotter surveilled MANNING on Old Spanish Trail until he pulled into the Corner Market by the gas pumps.
6. Agents Crowe and Fife then observed the passenger from the Ford Focus exit the vehicle and walk towards MANNING's vehicle, getting into the passenger's seat, with money in his hand. Agents never observed MANNING exit his vehicle. The passenger exited MANNING's vehicle walking back to the Ford Focus without the money and having his right hand closed as if it was holding an object. Agents then observed the male sit in the passenger seat of the Ford Focus and handed the female driver a small blue pill.
7. Agents Crowe and Fife made contact with the occupants of the Ford Focus confirming the pills were Oxycodone pills. Agent Cotter and Commander Casey Favre conducted a traffic stop on MANNING's vehicle. MANNING fled from Agent Cotter, ultimately crashing his vehicle on Webb Street near the railroad tracks.

8. MANNING fled from the vehicle on foot from Agent Cotter. While running into a grassy area, Agent Cotter observed MANNING to be grabbing something from his waistband. MANNING then threw an object into a grassy area. MANNING was taken to the ground and placed into custody for resisting arrest. Agent Cotter located a clear plastic bag in the grass that had been ripped open.
9. Agent Exposito and members of Bay St. Louis Police Department secured MANNING's residence for a search warrant to be obtained. A search warrant was granted through Hancock County Justice Court for MANNING's residence.
10. During a search of MANNING's bedroom, agents located a few loose Oxycodone pills. In a laundry basket, agents located a Glock model 23 handgun. In the room belonging to Chassity Manning (Willie MANNING Jr's mother), agents located a small safe. When asking Chassity about the safe, she stated it belonged to her daughter but her son was using it. Chassity did not know the combination and MANNING refused to provide it. Agents breached the safe locating \$1,570.00 in US Currency, a large bag of pills, and marijuana.
11. In a post Miranda interview of MANNING, he only answered questions about fleeing stating he has heard a lot about fake cops and Agent Cotter was not in a uniform. When questioned about the evidence located at his house or the drug transaction that was witnessed, MANNING continued to state, "next question."
12. The large amount of Oxycodone pills seized from the residence were submitted to United States' Customs and Border Protection Laboratory. On November 9, 2023, the analysis was returned with an official count of 1,406 pills weighting 177.68 grams. The pills were tested and determined to contain fentanyl.

13. Based on the aforementioned facts and circumstances, I believe that there is probable cause to believe Willie MANNING Junior has violated Title 21, United States Code, Section 841(a)(1).



William Cotter
Task Force Officer
Homeland Security Investigations

Sworn and subscribed before me
this the 4th day of December 2023.



UNITED STATES MAGISTRATE JUDGE